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FILED IN THE
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EASTERN DISTRICT OF WASHINGTON

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

2:16-CR-207-RMP

INDICTMENT

11 UNITED STATES OF AMERICA,
12 Plaintiff,

Vio: 18 U.S.C. §§ 371,
922(a)(1)(A), 923(a)
Conspiracy to Deal
Firearms Without a
Firearms License
(Count 1)

13 vs.
14
15 TERRY RUSSELL HUNT,
16 MARY ALICE HUNT,
17 RUSSELL MELVIN HUNT, and
DEREK JON HUNT,
18 Defendants.

Vio: 18 U.S.C. §§ 922(a)(1)(A),
923(a), 924(a)(1)(D)
Dealing in Firearms Without a
License
(Count 2)

Vio: 18 U.S.C. §§ 922(a)(6), 924(a)(2)
False Statement in the
Purchase of a Firearm
(Counts: 3-16)

18 U.S.C. § 924(d)(1) and
28 U.S.C. § 2461(c)
Forfeiture Allegations

24 The Grand Jury charges that:

25 **COUNT 1**

26 Beginning on an exact date unknown but by on or about June 12, 2011, and
27 continuing through on or about December 2, 2015, in the Eastern District of Washington

1 and elsewhere, to include the Western District of Washington and the District of Nevada,
2 Defendants TERRY RUSSELL HUNT, MARY ALICE HUNT, RUSSELL MELVIN
3 HUNT, and DEREK JON HUNT, did knowingly and intentionally combine, conspire,
4 confederate and agree with each other and with other persons, both known and unknown,
5 to commit the following offense against the United States, namely to engage in the
6 business of dealing in firearms without a federal firearms license, in violation of 18
7 U.S.C. §§ 922(a)(1)(A), 923(a), and one or more of the Defendants committed an overt
8 act to effect the object of the conspiracy, including but not exclusively, the sale of
9 firearms alleged in Paragraphs A through F of this Count, all said sales occurring
10 between on or about June 12, 2011, and on or about December 2, 2015, which are hereby
11 incorporated by reference:

- 12 A. Sale of Smith and Wesson, Model Bodyguard, .380 Caliber Pistol, bearing
13 serial number EBR8323, purchased by MARY HUNT, and later sold on or
14 about August 17, 2012;
- 15 B. Sale of Glock, Model 42, .380 Caliber Pistol, bearing serial number
16 AAWT524, purchased by TERRY HUNT and later sold on or about
17 November 14, 2014;
- 18 C. Sale of Smith and Wesson, Model M&P, 9mm Caliber Pistol, bearing serial
19 number HVS5690, purchased by TERRY HUNT and later sold on or about
20 August 14, 2015;
- 21 D. Sale of Glock, Model 42, .380 Caliber Pistol, bearing serial number
22 ABEZ086, purchased by TERRY HUNT and later sold on or about August
23 14, 2015;
- 24 E. Sale of Smith and Wesson, Model Bodyguard, .38 Caliber Revolver, bearing
25 serial number CXZ3044, purchased by TERRY HUNT and later sold on or
26 about August 14, 2015;

1 F. Sale of Taurus, Model "The Judge," 45/410 Caliber Revolver, bearing serial
2 number BS632662, purchased by DEREK HUNT and later sold on or about
3 August 14, 2015.

4 In addition to the overt acts alleged in A through F above, at least one or more of
5 the following overt acts were committed in the course of and in furtherance of the
6 conspiracy.

7 G. On November 1, 2012, Daniel Thomas Hammock illegally purchased four
8 (4) firearms at the Cascade Arms Co. located in Olympia, WA, within the
9 Western District of Washington, for Terry Russell Hunt who told Hammock
10 that he was going to sell the firearms at the Reno Gun Show. This took place
11 after Terry Russell Hunt was advised by ATF on April 18, 2012, that he
12 could not sell firearms at the Reno Gun Show without first obtaining a
13 Federal Firearm License.

14 H. On March 25, 2013, Daniel Thomas Hammock illegally purchased four (4)
15 firearms at the Cascade Arms Co. located in Olympia, WA, within the
16 Western District of Washington for Terry Russell Hunt who told Hammock
17 that he was going to sell the firearms at the Reno Gun Show. This took place
18 after Terry Russell Hunt was advised by ATF on April 18, 2012, that he
19 could not sell firearms at the Reno Gun Show without first obtaining a
20 Federal Firearm License.

21 I. On August 9, 2013, Daniel Thomas Hammock illegally purchased four (4)
22 firearms at the Cascade Arms Co. located in Olympia, WA, within the
23 Western District of Washington for Terry Russell Hunt who told Hammock
24 that he was going to sell the firearms at the Reno Gun Show. This took place
25 after Terry Russell Hunt was advised by ATF on April 18, 2012, that he
26 could not sell firearms at the Reno Gun Show without first obtaining a
27 Federal Firearm License.

J. On the dates listed below one or more of the Defendants traveled to the Reno Gun Show, located in Reno Nevada, within the District of Nevada, for the purpose of selling firearms, which the Defendants had purchased in the Eastern and Western Districts of Washington. Each date constitutes a separate overt act in the furtherance of the Conspiracy charged in this count of this Indictment.

- i. August 17-19, 2012
- ii. November 16-18, 2012
- iii. April 11-14, 2013
- iv. August 15-18, 2013
- v. November 22-24, 2013
- vi. April 18-20, 2014
- vii. August 15-18, 2014
- viii. November 14-16, 2014
- ix. March 27-29, 2015
- x. August 14-16, 2015

K. The allegations alleged in Counts 3 through 16 of this Indictment are each separately alleged as a separate overt act taking place during and in furtherance of the conspiracy alleged in this Count of this Indictment.

All in violation of 18 U.S.C. § 371.

COUNT 2

Beginning on an exact date unknown but by on or about June 12, 2011, and continuing through on or about December 2, 2015, in the Eastern District of Washington and elsewhere, to include the Western District of Washington and the District of Nevada, the defendants TERRY RUSSELL HUNT, MARY ALICE HUNT, RUSSELL MELVIN HUNT, and DEREK JON HUNT not being licensed dealers of firearms within the meaning of Chapter 44, Title 18, United States Code, did wilfully engage in the business

1 of dealing in firearms, in violation of 18 U.S.C. §§ 922(a)(1)(A), 923(a), 924(a)(1)(D)
2 and 18 U.S.C. § 2.

3 COUNT 3

4 On or about November 13, 2012, in the Eastern District of Washington, the
5 Defendant, DEREK JON HUNT, in connection with the acquisition of firearms, to wit: a
6 Glock Model 26, 9mm pistol, bearing serial number TVL444, and a Kimber 45 caliber
7 pistol, bearing serial number KU198569, from H.O.T.S., Inc.; Hooked on Toys, 1444 N.
8 Wenatchee, Ave., Wenatchee, WA, a licensed dealer of firearms within the meaning of
9 Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written
10 statement to G.R., which statement was intended and likely to deceive G.R., as to a fact
11 material to the lawfulness of such sale of said firearms to the Defendant under Chapter 44
12 of Title 18, in that the defendant represented that he was purchasing said firearms for
13 himself when he knew he was purchasing the firearms for resale to another person; in
14 violation of 18 U.S.C. §§ 922(a)(6), 924(a)(2).

15 COUNT 4

16 On or about April 26, 2013, in the Eastern District of Washington, the Defendant,
17 DEREK JON HUNT, in connection with the acquisition of firearms, to wit: a Glock
18 Model 23 Gen 4, .40 caliber pistol, bearing serial number UKR 175, and a Sig-Sauer
19 Mosquito .22LR caliber pistol, bearing serial number F183033, from Northwest Pawn &
20 Collector Arms, 818 N. Pines Road, Spokane, WA, a licensed dealer of firearms within
21 the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and
22 fictitious written statement to K.B. which statement was intended and likely to deceive
23 K.B., as to a fact material to the lawfulness of such sale of said firearms to the Defendant
24 under Chapter 44 of Title 18, in that the Defendant represented that he was purchasing
25 said firearms for himself when he knew he was purchasing the firearms for resale to
26 another person; in violation of 18 U.S.C. §§ 922(a)(6), 924(a)(2).

1 COUNT 5
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3 On or about July 31, 2015, in the Eastern District of Washington, the Defendant,
4 DEREK JON HUNT, in connection with the acquisition of firearms, to wit: a Glock
5 Model 30, .45 caliber pistol, bearing serial number EZC105US, and a Taurus Model
6 M4510, THE JUDGE .45/410 caliber revolver, bearing serial number BSE632662, and a
7 Smith and Wesson Model SW9VE, 9mm pistol, bearing serial number RAY1900, and a
8 Smith and Wesson Model 617-6 .22LR caliber revolver, bearing serial number
9 CYH3048, and a Springfield Model XD 45, .45 caliber pistol, bearing serial number
10 US678545 from Northwest Pawn & Collector Arms, 818 N. Pines Road, Spokane, WA, a
11 licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States
12 Code, knowingly made a false and fictitious written statement to K.B. which statement
13 was intended and likely to deceive K.B., as to a fact material to the lawfulness of such
14 sale of said firearms to. the Defendant under Chapter 44 of Title 18, in that the defendant
15 represented that he was purchasing said firearms for himself when he knew he was
16 purchasing the firearms for resale to another person; in violation of 18 U.S.C. §§
922(a)(6), 924(a)(2).

17 COUNT 6
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19 On or about, April 26, 2013, in the Eastern District of Washington, the Defendant,
20 RUSSELL MELVIN HUNT, in connection with the acquisition of firearms, to wit: a
21 Glock Model 35, .40 caliber pistol, bearing serial number TWR685, and a Sig-Sauer,
22 Model 1811 Ultra Compact, .45 caliber pistol, bearing serial number 54A013587, from
23 Northwest Pawn & Collector Arms, 818 N. Pines Road, Spokane, WA, a licensed dealer
24 of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly
25 made a false and fictitious written statement to K.B. which statement was intended and
26 likely to deceive K.B., as to a fact material to the lawfulness of such sale of said firearms
27 to the Defendant under Chapter 44 of Title 18, in that the Defendant represented that he
28 was purchasing said firearms for himself when he knew he was purchasing the firearms
for resale to another person; in violation of 18 U.S.C. §§ 922(a)(6), 924(a)(2).

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COUNT 7

On or about December 5, 2014, in the Eastern District of Washington, the Defendant, RUSSELL MELVIN HUNT in connection with the acquisition of firearms, to wit: a Sig-Sauer Mosquito .22 caliber pistol, bearing serial number F023918, and a Kimber Ultra Carry II .45 caliber pistol, bearing serial number KU25816, from Stan's Merry Mart, Inc.; 733 S. Wenatchee Ave., Wenatchee, WA, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to E.R. which statement was intended and likely to deceive E.R., as to a fact material to the lawfulness of such sale of said firearms to the Defendant under Chapter 44 of Title 18, in that the defendant represented that he was purchasing said firearms for himself when he knew he was purchasing the firearms for resale to another person; in violation of 18 U.S.C. §§ 922(a)(6), 924(a)(2).

COUNT 8

On or about November 20, 2012, in the Eastern District of Washington, the Defendant, RUSSELL MELVIN HUNT, in connection with the acquisition of firearms, to wit: a Glock Model 26, 9mm pistol, bearing serial number TMH232, and a Glock Model 19 9mm pistol, bearing serial number THN666, from White Elephant #1, 1730 N. Division, Spokane, WA, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to D.B. which statement was intended and likely to deceive D.B., as to a fact material to the lawfulness of such sale of said firearms to the defendant under Chapter 44 of Title 18, in that the Defendant represented that he was purchasing said firearms for himself when he knew he was purchasing the firearms for resale to another person; in violation of 18 U.S.C. §§ 922(a)(6), 924(a)(2).

COUNT 9

On or about, November 9, 2013, in the Eastern District of Washington, the Defendant, MARY ALICE HUNT, in connection with the acquisition of firearms, to wit: a Smith and Wesson Shield 9mm pistol, bearing serial number HPV 4091, and Sig-Sauer

1 Equinox 9mm pistol, bearing serial number 52A072604, and a Smith and Wesson
2 Bodyguard .380 caliber pistol, bearing serial number KAN 4446, and a Smith and
3 Wesson Ladysmith .38 caliber revolver, bearing serial number CUJ0563, from White
4 Elephant #2, E. 12614 Sprague, Spokane, WA, a licensed dealer of firearms within the
5 meaning of Chapter 44, Title 18, United States Code, knowingly made a false and
6 fictitious written statement to T.T. which statement was intended and likely to deceive
7 T.T., as to a fact material to the lawfulness of such sale of said firearms to the Defendant
8 under Chapter 44 of Title 18, in that the Defendant represented that she was purchasing
9 said firearms for herself when she knew she was purchasing the firearms for resale to
10 another person; in violation of 18 U.S.C. §§ 922(a)(6), 924(a)(2).

11 COUNT 10

12 On or about November 9, 2013, in the Eastern District of Washington, the
13 Defendant, MARY ALICE HUNT, in connection with the acquisition of firearms, to wit:
14 a Smith and Wesson Bodyguard 380, .38caliber revolver, bearing serial number
15 CUH9069, and Sig-Sauer P238,.380 caliber pistol, bearing serial number 27A214905,
16 from White Elephant #1, 1730 N. Division, Spokane, WA, a licensed dealer of firearms
17 within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false
18 and fictitious written statement to R.V. which statement was intended and likely to
19 deceive R.V., as to a fact material to the lawfulness of such sale of said firearms to the
20 Defendant under Chapter 44 of Title 18, in that the Defendant represented that she was
21 purchasing said firearms for herself when she knew she was purchasing the firearms for
22 resale to another person; in violation of 18 U.S.C. §§ 922(a)(6), 924(a)(2).

23 COUNT 11
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25 On or about July 27, 2013, ~~2012~~^{Eoh}, in the Eastern District of Washington, the
26 Defendant, MARY ALICE HUNT, in connection with the acquisition of firearms, to wit:
27 a Charter Arms, Model Chick Lady, .38 caliber revolver, bearing serial number 13-
28 16837, and a Ruger, Model LCR LG, bearing serial number 542-32770, from White
Elephant #2, E. 12614 Sprague, Spokane, WA, a licensed dealer of firearms within the

1 meaning of Chapter 44, Title 18, United States Code, knowingly made a false and
2 fictitious written statement to R.J. which statement was intended and likely to deceive
3 R.J., as to a fact material to the lawfulness of such sale of said firearms to the Defendant
4 under Chapter 44 of Title 18, in that the Defendant represented that she was purchasing
5 said firearms for herself when she knew she was purchasing the firearms for resale to
6 another person; in violation of 18 U.S.C. §§ 922(a)(6), 924(a)(2).

7 COUNT 12

8 On or about April 22, 2015, in the Eastern District of Washington, the Defendant,
9 MARY ALICE HUNT, in connection with the acquisition of firearms, to wit: a Ruger
10 Model LCR, .38 caliber revolver, bearing serial number 543-03357, and a Ruger Model
11 LCR, .38 caliber revolver, bearing serial number 543-29073, from Stan's Merry Mart,
12 Inc., 733 S. Wenatchee Ave., Wenatchee, a licensed dealer of firearms within the
13 meaning of Chapter 44, Title 18, United States Code, knowingly made a false and
14 fictitious written, statement to G.R., which statement was intended and likely to deceive
15 G.R., as to a fact material to the lawfulness of such sale of said firearms to the Defendant
16 under Chapter 44 of Title 18, in that the Defendant represented that she was purchasing
17 said firearms for herself when she knew she was purchasing the firearms for resale to
18 another person; in violation of 18 U.S.C. §§ 922(a)(6), 924(a)(2).

19 COUNT 13

20 On or about June 12, 2014, in the Eastern District of Washington, the Defendant,
21 TERRY RUSSELL HUNT, in connection with the acquisition of firearms, to wit: a
22 Glock Model 42, .380 caliber pistol, bearing serial number AATU232, and a Kimber
23 Solo 9mm pistol, bearing serial number S1156588, from H.O.T.S., Inc., Hooked On
24 Toys, located at 1444 N. Wenatchee, Ave., Wenatchee, WA, a licensed dealer of firearms
25 within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false
26 and fictitious written statement to S.S., which statement was intended and likely to
27 deceive S.S., as to a fact material to the lawfulness of such sale of said firearms to the
28 Defendant under Chapter 44 of Title 18, in that the Defendant represented that he was

1 purchasing said firearms for himself when he knew he was purchasing the firearms for
2 resale to another person; in violation of 18 U.S.C. §§ 922(a)(6), 924(a)(2).

3 COUNT 14

4 On or about July 27, 2013, in the Eastern District of Washington, the Defendant,
5 TERRY RUSSELL HUNT, in connection with the acquisition of firearms, to wit: a
6 Springfield Model XDS .45 caliber pistol, bearing serial number XS 678438, and a
7 Springfield, Model XDS 9 mm pistol, bearing serial number XS-911623, from White
8 Elephant #2, E. 12614 Sprague, Spokane, WA, a licensed dealer of firearms within the
9 meaning of Chapter 44, Title 18, United States Code, knowingly made a false and
10 fictitious written statement to T.T. which statement was intended and likely to deceive
11 T.T., as to a fact material to the lawfulness of such sale of said firearms to the Defendant
12 under Chapter 44 of Title 18, in that the Defendant represented that he was purchasing
13 said firearms for himself when he knew he was purchasing the firearms for resale to
14 another person; in violation of 18U.S.C. §§ 922(a)(6), 924(a)(2).

15 COUNT 15

16 On or about November 26, 2014, in the Eastern District of Washington, the
17 Defendant, TERRY RUSSELL HUNT, in connection with the acquisition of firearms, to
18 wit: a, Kimber Solo 9mm pistol, bearing serial number S1160664, and a Kimber Solo
19 9mm pistol, bearing serial number S1135246, from H.O.T.S., Inc., Hooked on Toys,
20 1444 N. Wenatchee, Ave., Wenatchee, WA, a licensed dealer of firearms within the
21 meaning of Chapter 44, Title 18, United States Code, knowingly made a false and
22 fictitious written statement to S.S., which statement was intended and likely to deceive
23 S.S., as to a fact material to the lawfulness of such sale of said firearms to the Defendant
24 under Chapter 44 of Title 18, in that the Defendant represented that he was purchasing
25 said firearms for himself when he knew he was purchasing the firearms for resale to
26 another person; in violation of 18U.S.C. §§ 922(a)(6), 924(a)(2).

1 COUNT 16
2

3 On or about June 10, 2014, in the Eastern District of Washington, the Defendant,
4 TERRY RUSSELL HUNT, in connection with the acquisition of firearms, to wit: a
5 Glock Model 42, .380 caliber pistol, bearing serial number ATTS368, and a Smith and
6 Wesson, M&P 9 Shield 9mm pistol, bearing serial number HSB6299, from Stan's Merry
7 Mart, Inc., 733 S. Wenatchee Ave., Wenatchee, WA, a licensed dealer of firearms within
8 the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and
9 fictitious written statement to D.W., which statement was intended and likely to deceive
10 D.W., as to a fact material to the lawfulness of such sale of said firearms to the Defendant
11 under Chapter 44 of Title 18, in that the Defendant represented that he was purchasing
12 said firearms for himself when he knew he was purchasing the firearms for resale to
another person; in violation of 18 U.S.C. §§ 922(a)(6), 924(a)(2).

13 **NOTICE OF FORFEITURE ALLEGATIONS**

14 The allegations contained in the Indictment are hereby re-alleged and incorporated
15 herein by this reference for the purpose of alleging forfeitures pursuant to 18 U.S.C. §
16 924(d)(1) and 28 U.S.C. § 2461(c).

17 Pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c), upon conviction of an
18 offense in violation of 18 U.S.C. §§ 922(a)(1)(A), 371, as set forth in Count 1 of this
19 Indictment, Defendants TERRY RUSSELL HUNT, MARY ALICE HUNT, RUSSELL
20 MELVIN HUNT, and DEREK JON HUNT, shall forfeit to the United States, any
21 firearms and ammunition involved in the commission, including, but not limited to:

22 Seized on or about November 13, 2015

- 23 1. Colt Unknown Revolver, Caliber: .38, SN: 229805;
- 24 2. Smith & Wesson 686 Revolver, Caliber: .357, SN: ADW7868;
- 25 3. Colt Ace Pistol, Caliber: .22, SN: 400521;
- 26 4. Smith & Wesson 19 Revolver, Caliber: .357, SN: 1K53943;
- 27 5. Colt SAA Revolver, Caliber: .45, SN: S28967A;
- 28 6. Ruger Bearcat Revolver, Caliber: .22 SN: 91-30370;
7. Smith & Wesson 27 Revolver, Caliber: .357 SN: N81284;

- 1 8. Smith & Wesson 41 Pistol, Caliber: .22 SN: 12923;
- 2 9. Beretta, Pietro S.P.A 86 Pistol, Caliber: .380 SN: G08577Y;
- 3 10. Beretta USA Corp 21A Pistol, Caliber: .22 SN: BCS27326U;
- 4 11. Rifles Inc., Caliber: 7mm, SN: S6269094;
- 5 12. Stevens Unknown Rifle, Caliber: .22LR, SN: K16;
- 6 13. Glock, Inc. 32 Pistol, Caliber: .357, SN: FDH648;
- 7 14. Ruger 10/22 Rifle, Caliber: .22, SN: 82102649;
- 8 15. Benelli Super Black Eagle Shotgun, Caliber: 12 gauge, SN: U121684;
- 9 16. Winchester 37 Shotgun, Caliber: .410, SN: None;
- 10 17. Bond Arms Inc. Snake Slayer Derringer, Caliber: 45/410, SN: 62777;
- 11 18. Winchester 94 Rifle, Caliber: 25-35, SN: 1605994;
- 12 19. Winchester 94 Rifle, Caliber: .30, SN: 1396790;
- 13 20. Winchester 62A Rifle, Caliber: .22, SN: 353115;
- 14 21. Smith & Wesson M&P 15-22 Rifle, Caliber: .22, SN: DZY6082;
- 15 22. Ithaca Gun Co. Hammerless Shotgun, Caliber: 12 gauge, SN: 114666;
- 16 23. Colt Frontier Scout Revolver, Caliber: .22, SN: 180922F;
- 17 24. Remington Arms Company, Inc. 700 Rifle, Caliber: .280, SN: C6393169;
- 18 25. Barrett Firearms Mfg. Co. 99 Rifle, Caliber: .50 BMG, SN: 1688;
- 19 26. Uberti, Aldo 1873 Dakota Revolver, Caliber: .45, SN: 76158;
- 20 27. Browning Auto Rifle, Caliber: .22, SN: 12448PY146;
- 21 28. F.N. (FN Herstal) FNAR Rifle, Caliber: .762, SN: 319MN03564;
- 22 29. Sig-Sauer P220 Pistol, Caliber: .22, SN: G424321;
- 23 30. Ruger Creedmoor Rifle, Caliber: 6.5 mm, SN: 694-53677;
- 24 31. F.N. (FN Herstal) Mauser Rifle, Caliber: .270, SN: X0744
- 25 32. Ruger 10/22 Rifle, Caliber: .22, SN: 25080832;
- 26 33. Sako L61R Finnbear Rifle, Caliber: .30-06, SN: 518682;
- 27 34. Smith & Wesson Unknown Rifle, Caliber: .270, SN: 327054;
- 28 35. USA F MFG 22 Revolver, Caliber: .22LR, SN: 22835;
36. Sig Sauer (Sig-Arms) Sig M400 Rifle, Caliber: .556, SN: 20C047273;
37. Browning BL Rifle, Caliber: .22, SN: 71B32828;
38. Winchester 70 Rifle, Caliber: .257, SN: 43641;
39. Sig-Sauer 1911 Pistol, Caliber: .45, SN: 54B091082;
40. Stag Arms Stag-15 Rifle, Caliber: .556, SN: 256668;
41. Miroku Firearm Co. Unknown Rifle, Caliber: Unknown; SN: 02178PN136;
42. Sako L61R Finnbear Rifle, Caliber: .375, SN: 509768;
43. Rock River Arms, Inc. AR 15 Rifle, Caliber: .556, SN: LH104728;

- 1 44. Rifle Works, Caliber: 7mm, SN: C6598828;
- 2 45. Winchester 70 Rifle, Caliber: .30-06, SN: 287;
- 3 46. F.N. (FN Herstal) Mauser Rifle, Caliber 7mm, SN: X0307;
- 4 47. Lewis Machine and Tool Co. Defender 2000 Rifle, Caliber: .556, SN: 65056;
- 5 48. Juggernaut TactiCaliber, Inc. JT-10 Rifle, Caliber: .762, SN: B23970D;
- 6 49. Savage 11 Rifle, Caliber 6.5mm, SN: J825739;
- 7 50. Henry Repeating Rifle Company Golden Boy Rifle, Caliber: .22, SN: GB432946;
- 8 51. Blaser (Blaser Jagdwaffen GMBH) R93 Rifle, Caliber: .223, SN: BC-05242;
- 9 52. Blaser (Blaser Jagdwaffen GMBH) R93 Rifle, Caliber: 7mm, SN: BC-04666;
- 10 53. Winchester 94 Rifle, Caliber: .30-30, SN: 6331790;
- 11 54. Great Guns 7mm Rifle, SN: S6237365;
- 12 55. Winchester M70 Rifle, SN: 271538;

13 Seized on or about December 2, 2015

- 14 56. Mossberg 464 Rifle, Caliber: .30-30, SN: LA061324;
- 15 57. Ruger Precision Rifle, Caliber: .308, SN: 1800-05104
- 16 58. Mossberg 151MB Rifle, Caliber: .22, SN: None;
- 17 59. Savage Arms, Inc., CD 42 Combination Gun, Caliber: .22/410, SN: H856503;
- 18 60. Remington Arms Company, Inc., 700 Rifle, Caliber: 7mm, SN: S6387446;
- 19 61. Unknown Manufacturer AR15 Rifle, Caliber: .223, SN: D14382B;
- 20 62. Winchester 70 Rifle, Caliber: .30-06, SN: 374956;
- 21 63. Kimber Solo CDP Pistol, Caliber: 9mm, SN: S1140651;
- 22 64. Izhmash (IMEZ) Saiga-12 Shotgun, Caliber: 12 gauge, SN: H09412792;
- 23 65. Unknown Manufacturer AR15 Rifle, Caliber: .556, SN: D44812B;
- 24 66. Stonefire Arms, LLC, SFA-15 Rifle, Caliber: .556, SN: A100079;
- 25 67. Rock River Arms, Inc., AR 15 Rifle, Caliber: .556, SN: CM74218;
- 26 68. Gaucha IGA Shotgun, Caliber: 20 gauge, SN: 862039;
- 27 69. Stag Arms Stag-15 Rifle, Caliber: 556 SN: 256185;
- 28 70. CZ USA 452 Scout Rifle Caliber: .22LR, SN: A096252;
71. Palmetto State Armory PA-15 Rifle, Caliber: .556, SN: LW130272;
72. Kimber Micro Carry Pistol, Caliber: .380, SN: T0014930;
73. Smith & Wesson PC1911 Pistol, Caliber: .45, SN: UCY0417;

1 74. Smith & Wesson 648 Revolver, Caliber: .22, SN: BHJ9249;
2 75. Smith & Wesson 642 Revolver, Caliber: .38, SN: CRA7616;
3 76. Smith & Wesson Bodyguard Revolver, Caliber: .38, SN: CXX5883;
4 77. Glock Inc., 17 Pistol, Caliber: 9mm, SN: TKC181;
5 78. Smith & Wesson 637-2 Pistol, Caliber: .38, SN: CRD6671;
6 79. Glock Inc. 43 Pistol, Caliber: 9mm, SN: ZXK553;
7 80. Sig-Sauer 1911 C3 Pistol, Caliber: .45, SN: GS79082;
8 81. Ruger LCR Revolver, Caliber: .38, SN: 543-03357;
9 82. Glock Inc. 21 Pistol, Caliber: .45, SN: HMM766;
10 83. Glock Inc. 42 Pistol, Caliber: .380, SN: ABHT193;
11 84. Ruger LCR Revolver, Caliber: .38, SN: 543-29073;
12 85. Glock Inc. 45 Pistol, Caliber: 9mm, SN: BABS921;
13 86. Glock Inc. 19 Pistol, Caliber: 9mm, SN: WSW199;
14 87. Glock Inc. 19 Pistol, Caliber: 9mm, SN: RRU153;
15 88. Ruger LCR Revolver, Caliber: 9mm, SN: 549-61096;
16 89. Ruger LCR Revolver, Caliber: .38, SN: 542-20381;
17 90. Israel Weapon IND-IWI (Israel Military IND-IMI) Desert Eagle, Caliber:
18 .50, SN: 95203762;
19 91. Keltec, CNC Industries, Inc. PMR-30 Pistol, Caliber: .22, SN: WXS77;
20 92. Beretta USA Corp BU9 Nano Pistol, SN: NU094018;
21 93. Sig-Sauer 1911 Pistol, Caliber: .45, SN: 54B108738;
22 94. Smith & Wesson M&P 9.Shield Caliber: 9mm, Pistol, SN: HWR2225;
23 95. Sig-Sauer P938 Pistol, Caliber: 9mm, SN: 52A024553;
24 96. Glock Inc. 32 Pistol, Caliber: .357, SN: ETL139US;
25 97. Keltec, CNC Industries, Inc. PMR-30 Pistol, Caliber: .22, SN: WXS73;
26 98. Keltec, CNC Industries, Inc. PMR-30 Pistol, Caliber: .22, SN: WXS78;
27 99. Keltec, CNC Industries, Inc. PMR-30 Pistol, Caliber: .22, SN: WXS75;
28 100. Sig Sauer (Sig-Arms) P938 Pistol, Caliber: 9mm, SN: 52B142772;
1 101. Sig Sauer (Sig-Arms) P938 Pistol, Caliber: .22, SN: 52B051643;
2 102. Smith & Wesson M&P Caliber: 9mm, Shield Pistol, SN: HKC7899;
3 103. Taurus International The Judge Revolver, Caliber: .45/410, SN: IU158697;
4 104. Smith & Wesson 10-6 Revolver, Caliber: .38, SN: D996600;
5 105. Smith & Wesson 10-8 Revolver, Caliber: .38, SN: 9D89438;
6 106. Taurus International The Judge Revolver, Caliber: .45/410,
7 SN: CP771584;

1 107. Smith & Wesson 10-5 Revolver, Caliber: .38, SN: C935163;
2 108. Colt Bisley Revolver, Caliber: .32, SN: 312059;
3 109. Smith & Wesson 63 Revolver, Caliber: .22, SN: 7145;
4 110. Glock Inc. 27 Pistol, Caliber: .40, SN: NDD346; and,
5 111. Smith & Wesson 66 Revolver, Caliber: .357, SN: CFT9446

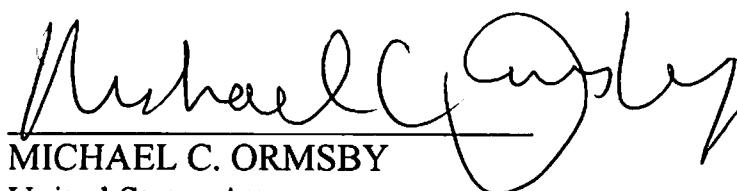
6 If any of the property described above, as a result of any act or omission of any of
7 the Defendants:

8 (a) cannot be located upon the exercise of due diligence;
9 (b) has been transferred or sold to, or deposited with, a third party;
10 (c) has been placed beyond the jurisdiction of the court;
11 (d) has been substantially diminished in value; or
12 (e) has been commingled with other property which cannot be divided without
13 difficulty;

14 the United States shall be entitled to forfeiture of substitute property pursuant to 21
15 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c). All pursuant to 18 U.S.C. §
16 924(d) and 28 U.S.C. § 2461(c).

17 Dated this 20th day of December, 2016.

18 A TRUE BILL

21 
22 MICHAEL C. ORMSBY
23 United States Attorney

24 
25 Earl A. Hicks
26 Assistant United States Attorney